

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

MICHAEL TABA (07)

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CAUSE NO. 3:17-CR-155-L

DR. MICHAEL TABA'S EXHIBIT LIST

Pursuant to Rule 16.1(2) of the Local Rules for the Northern District of Texas and the Scheduling Order entered by the Court, Dr. Michael Taba, defendant, submits the following exhibit list that may be used in his defense at trial, exclusive of impeachment and rebuttal exhibits. Defendant adopts all government and co-defendant exhibits filed in this case, subject to and without waiving challenges to admissibility. Dr. Taba reserves the right to amend or supplement this Exhibit List, subject to the Court's rulings.

Exhibit No.	Date Offered	Date Admitted	Objections/ Stipulated Admissions	Description of Exhibit
1				Standard Operating Policies and Procedures- Dr. Michael Taba Advanced Orthopedics
2				Policies and Procedures re: HIPAA – Advanced Orthopedics
3				Employee Contracts at Advanced Orthopedics
4				Preoperative and Postoperative Instructions – Advanced Orthopedics
5				Letter from Dr. Michael Taba to Home Health Services dated October 23, 2013
6				Intra-office Email from Dr. Taba dated October 25, 2014

7				“DO NOT FILL” Patient List- Advanced Orthopedics.
8				Compounding Protocol by Melissa Driver
9				Patient DJ Medical Chart
10				Patient DS Medical Chart
11				Patient RC Medical Chart
12				Patient LB Medical Chart
13				Patient JA Medical Chart
14				Patient CM Medical Chart
15				Patient EH Medical Chart
16				Patient MD Medical Chart
17				Patient TS Medical Chart
18				Patient JK Medical Chart
19				Patient DJ.2 Medical Chart
20				Patient EM Medical Chart
21				Patient JJ Medical Chart
22				Patient LH Medical Chart
23				Patient AR Medical Chart
24				Patient YB Medical Chart
25				Patient RS Medical Chart
26				Patient LF Medical Chart
27				Patient AD Medical Chart

28				Patient JJ.2 Medical Chart
29				Patient JS Medical Chart
30				Patient IP Medical Chart
31				Patient LM Medical Chart
32				Patient KC Medical Chart
33				Patient LP Medical Chart
34				Patient SB Medical Chart
35				Patient EL Medical Chart
36				Patient SR Medical Chart
37				Patient KR Medical Chart
38				Patient AM Medical Chart
39				Patient NB Medical Chart
40				Patient SR Medical Chart
41				Patient LO Medical Chart
42				Patient IS Medical Chart
43				Patient BE Medical Chart
44				Patient RM Medical Chart
45				Patient MM Medical Chart
46				Patient EG Medical Chart
47				Patient RF Medical Chart
48				Patient JA Medical Chart

49				Patient PS Medical Chart
50				Patient BO Medical Chart
51				Patient CO Medical Chart
52				Patient LP Medical Chart
53				Patient AC Medical Chart
54				Patient LC Medical Chart
55				Patient CC Medical Chart
56				Patient AC.2 Medical Chart
57				Email Communications dated 12/2014 between Jesse Dresser and Ali Alavi, Christopher Rydberg
58				Email communications between Melissa Driver and Robert Van Gieson
59				Email Communications between Dr. Taba and Melissa Driver
60				Intra office emails communications- General
61				Email Communications between Melissa Driver and Ability Pharmacy Personnel
62				Email From Sharnece Pratt to Melissa St. Clair July 22, 2014
63				Emails from Peggy Packard
64				Facsimile transmissions from Melissa Driver to "James" Noryian
65				Advanced Orthopedics Clinic Schedule December 2014
66				Billing Records by Megan Marines, Mona Guadian, and Carlos Lopez September 2014
67				Note from Mona Guadian to James Noryian "\$\$moneyteam\$\$"
68				CV – Dr. David Lewis
69				Compounding Cream Journal Articles

70				Voltaren Gel Insert- Drug insert
71				CV- Dr. Neal Small
72				CV- Dr. Daniel Buffington
73				CV -Bart Baggett
74				Revision Bulletin- Pharmaceutical Compounding Non Sterile Preparations
75				Topical Compound Components- 1-4916
76				Handwritten Notes for Calling on Refills- 1-4920
77				Instructional Handwritten and Typed Notes on filling out Rx 1-4927, 1-5515-16
78				Plea Agreement, Kevin Williams
79				Factual Resume, Kevin Williams
80				Plea Agreement Supplement, Kevin Williams
81				Facsimile transmissions from Judy Bachman to Melissa Driver 1-5484, 2-1554
82				Reserved
83				Reserved
84				Reserved
85				Reserved
86				Reserved
87				Reserved
88				Reserved
89				Reserved
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91				Reserved
92				Reserved
93				Reserved
94				Reserved
95				Reserved
96				Reserved
97				Memorandum of Interviews conducted by the government
98				Bandoola Surgical Magnum Loans February 2015- October 2015 totaling 18 million dollars
99				Email from Megan Marines to Williams May 2, 2016
100				Electronic Medical Records Work Flow Fax System
101				Standard Operating Procedure Re: Refills of Prescriptions
102				Dr. Taba's Office Billing
103				CVS CareMark Audit 1/9/2015
104				CVS CareMark Audit letter of 10/29/2014
105				Bank Records for Dr. Taba- personal
106				Bank Records for Advanced Orthopedics
107				Dr. Taba's Personal Income Tax Return - 2012
108				Dr. Taba's Personal Income Tax Return - 2013
109				Dr. Taba's Personal Income Tax Return - 2014
110				Dr. Taba's Personal Income Tax Return- 2015
111				Dr. Taba's Personal Income Tax Return- 2016

112				Dr. Taba's Personal Income Tax Return- 2017
113				Dr. Taba's Personal Income Tax Return - 2018
114				Advanced Orthopedics Income Tax Return -2012
115				Advanced Orthopedics Income Tax Return -2013
116				Advanced Orthopedics Income Tax Return -2014
117				Advanced Orthopedics Income Tax Return -2015
118				Advanced Orthopedics Income Tax Return -2016
119				Advanced Orthopedics Income Tax Return- 2017
120				Advanced Orthopedics Income Tax Return-2018
121				Letter of Intent to lease 411 N General Bruce property from James Noryian as Exhibit to lawsuit filed in Belton, Texas
122				Cashier's Checks- Not intended for Use
123				Forged prescriptions – prescription refills
124				Apothecary prescriptions
125				Authorized prescriptions by Dr. Taba
126				Cashier's checks issued to Dr. Taba for loan
127				Checks paid by Dr. Taba for repayment of loan
128				Certified copy of civil judgment
129				Certified copy of appellate bond
130				Letter re: loan satisfaction with interest
131				Civil settlement agreement between Cruz and Dr. Taba

132				Letter from OWCP to KR, dated 8-31-16
133				Letter from OWCP to BE, dated 8-31-16

Respectfully,

/s/ Erin Brennan

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CERTIFICATE OF SERVICE

I, Erin Brennan, hereby certify that on August 14, 2023, I electronically filed the foregoing document using the ECF system of the United States District Court, Northern District of Texas. Pursuant to L. CRIM. R. 49.2(f), delivery of the automatically generated ECF notice constitutes service under FED. R. CRIM. P. 49(b) on the attorney(s) of record.

/s/ Erin Brennan

ERIN BRENNAN